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Chevron

June 27, 1995

Chemical
Environment & Health Protection
6001 Bollinger Canyon Road
San Ramon, CA 94583

Ms. Julie Warren
Missouri Department of Natural Resources
Division of Environmental Quality
P. O. Box 176
Jefferson City, MO 65102

Maryland Heights, MO Site: Proposal for Change in Site Use

Dear Ms. Warren:

Thank you for your letter of May 26, 1995 approving of our proposed lease of a portion of our 2497 Adie Road property to Cerro Copper. As we discussed on June 19, however, Cerro chose not to lease our property after all. We are now discussing a site-lease with other interested parties.

Since our original proposal and your May 26 letter reference Cerro, we now request a general letter of consent. Specifically, we request your consent to our leasing the site, in whole or in part, to any party or parties for commercial uses. In all events, Chevron will retain ownership and responsibility for the subsurface residues. Consequently, Chevron will restrict and control any intrusions into the subsurface.

Considering that some prospective tenants may need to occupy the site quickly, the requested general consent seems most appropriate. As you suggested, we will be happy to provide you with the address and phone number of all actual tenants.

Julie, can you please provide another letter within, say, 30 days, or call me with any questions you may have?

Lastly, enclosed are the remaining analytical data obtained after the buildings were cleaned of our residues. The enclosed data relate to air samples taken in Building A. All constituents were 'non-detectable'.

Please call me anytime at ph: 510-842-2087 if you wish to further discuss these matters.

Sincerely,

A J Maciey

Anthony J. Maciey
Senior Environmental Projects Engineer

Attachments

cc: Ms. Catherine M. Barrett
Remedial Project Manager,Superfund Branch
U.S. Environmental Protection Agency, Region VII
726 Minnesota Avenue
Kansas City, KS 66101

ENVIRONMENTAL MONITORING AND TECHNOLOGIES, INC.

8100 North Austin Avenue
Morton Grove, Illinois 60053-3203
708-967-6666
FAX: 708-967-6735

Groundwater Monitoring
Laboratory Services
Mobile Laboratory Services
Source Emissions

Waste Characterization (RCRA)
Wastewater Compliance Monitoring
• Pretreatment
• User Charge

June 7, 1995

Mr. Anthony J.Maciey

Chevron Chemical Company
6001 Bollinger Canyon Road
P.O. Box 5047
San Ramon CA 94583

Re: Maryland Heights Testing

1.0 Data Assessment

EMT conducted air testing at your Maryland Heights, Missouri location on May 10, 1995. The samples were collected on sorbent tubes and filter media. The samples were shipped to Environmental Monitoring & Technologies, Inc.'s laboratory in Morton Grove IL. The samples were analyzed for dursban, sevin, DDT, arsenic, captan, diazinon. and heptachlor.

This data assessment is performed to identify any limitations of the data required by method-specific QA/QC requirements that would prevent or complicate the use of the data.

One hundred percent of the data in the study were evaluated and reviewed. None of the data was rejected.

2.0 Overall Assessment Summary

A total of 100 percent of the data was evaluated in a review. All holding times were met for the selected pesticides and arsenic. The overall quality of the data is good.

2.1 Organics Analysis

All samples were extracted (desorbed) following OSHA and NIOSH guidelines as to solvents, amounts and holding times. DDT and heptachlor were analyzed using SW 846, method 8080 using an Electron Capture detector and second column confirmation. Sevin, diazinon, dursban, and captan were analyzed using SW 846 method 8140 using a Nitrogen Phosphorus detector, with additional confirmation by SW 846 method 8270 using a GC/MS.

Capability for the organic analysis was performed by spiking seven replicates of the sampling media and calculating recovery. The recovery averaged 86% with precision of 7%. The accuracy is lower than the OSHA limits but within limits of methods 8140, 8080, 8270. The precision was good. Instruments were checked for tuning every 12 hours (8270). Tuning criteria was met in all cases. Calibrations were checked every 10 hours for method 8140 and every 12 hours for 8080 and 8270. All calibration were within the prescribed limits of those methods. Internal standards met the required criteria of the particular methods as to peak area and retention time. Spikes and spike duplicates were within 10.5% relative percent difference. No method blanks contained any of the compounds analyzed.

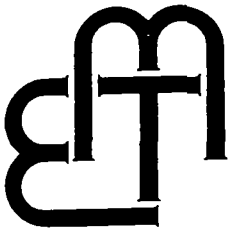
2.2 Metals Analysis

Arsenic was analyzed using Graphite Furnace Atomic Absorption utilizing NIOSH method 7901. EMT's laboratory employs the use of a Varian Graphite Furnace Atomic Absorption Spectrophotometer 400 with Zeeman background correction (Varian SpectrAA 400 w/Z). This instrument was used for the Arsenic Analysis

The operation and calibration of the Varian SpectrAA 400 w/Z is performed by an experienced and certified chemist/analyst.

The following quality control criteria are met for each analytical run:

A chemical modifier is added to a sample to reduce the interference, and/or isolate the analyte in a specific form which allows separation between background and analyte atomic absorption signals.



The Zeeman background correction technique is designed to correct for errors which would otherwise arise due to non-atomic absorption. The instrument will correct for non-atomic absorption which occurs during the analyte measurement period.

Pyrolytic platforms are used to minimize vapor phase interferences and to separate the atomic signals from the non-atomic signals.

A four-point calibration curve is performed to cover the desired analytical working range. Correlation coefficients must be >0.995.

After the calibration curve criteria are accepted as valid, an Initial Calibration Verification (ICV) solution is analyzed. The ICV solution is of an independent source, different from the source for the standards used for the calibration curve. Stock solutions with the certified value of accuracy are purchased for the analysis.
The control limit is +10% of the theoretical value. If the obtained value is outside the control limit of +10%, the calibration curve is recalibrated and the batch is restarted.

An Initial Calibration Blank (ICB) is analyzed immediately following the ICV. The ICB is prepared to match the matrix of the calibration standards and the check standards.

After every ten samples, Continuing Calibration Verification (CCV) at a concentration of mid-range of the calibration standard, and a Continuing Calibration Blank (CCB) is analyzed. If the CCV exceeds the control limit of +10% of the expected value, the previous ten samples are reanalyzed.

At least one sample in a batch, or one out of ten samples, whichever is more frequent, is matrix spiked and analyzed. At least one sample in a batch or one out of twenty samples whichever is more frequent, is duplicated or matrix spike duplicated. The control limit of the spike recovery and the Relative Percent Duplicate (RPD) is +20%. If the control limit is out of +20%, corrective action such as Dilution Test, Method of Standard Addition, and/or redigestion is performed.

A method blank is digested and analyzed for every batch to correct for any contamination during the sample preparation and the analysis.

A Laboratory Control Sample (LCS) is digested and analyzed for each analytical batch.

Method Detection Limit (MDL), Instrument Detection Limit (IDL), Limit Of Quantification (LOQ), and the reporting Limits are established semiannually.

Conclusion

We have reviewed the sampling procedures, analysis, data reduction, and reporting. We are confident that the results contained herein reflect the conditions sampled at the Maryland Heights facility.

Sincerely,

Greg Denny
Operations Manager

GD/vh/95060731

cc: Beata Bujak

Chevron Chemical Company
Maryland Heights, Missouri
Testing Performed On May 10, 1995

Building A	Captan mg/m^3	Sevin mg/m^3	Heptachlor mg/m^3	DDT mg/m^3	Arsenic mg/m^3	Diazinon mg/m^3	Dursban mg/m^3
Location A	<0.07	<0.07	<0.0001	<0.0002	<0.001	<0.007	<0.007
Location B	<0.07	<0.07	<0.0001	<0.0001	<0.001	<0.007	<0.007